

Michael Kind, Esq.
Nevada Bar No. 13903
KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, NV 89148
Phone: (800) 400-6808 x7
mkind@kazlg.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
dkrieger@hainesandkrieger.com
Attorneys for Plaintiff Thomas A. O'Connell

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Thomas A. O'Connell, Plaintiff, v. American Express Company, Bank of America, JPMorgan Chase Bank, NA, Franklin Capital Corporation, Shell/CBNA,	Case No.: 2:18-cv-00743-RFB-CWH Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss [ECF No. 27] (First Request)
--	---

Plaintiff Thomas A. O'Connell ("Plaintiff") and Bank of America ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **July 18, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Complaint, filed on June 20, 2018, ECF No. 27. Plaintiff's Response is currently due on July 4, 2018. *Id.*

1 In good faith and not for the purposes of delay, Plaintiff has requested and
2 Defendant has agreed to allow Plaintiff an additional 14 days to respond to the
3 Motion. Plaintiff requested the extension to allow counsel to properly respond to
4 Defendant's motion and to allow additional time for the parties to discuss possible
5 resolution. The Parties in good faith stipulate to allow additional time for Plaintiff
6 to respond to the Motion. This is the first request for an extension of this deadline.

7 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
8 to dismiss, ECF. No. 27, shall be due on or before **July 18, 2018**.

9 DATED this 2nd day of July 2018.

10 **KAZEROUNI LAW GROUP, APC**

11 By: /s/ Michael Kind
12 Michael Kind, Esq.
13 6069 South Fort Apache Road, Suite 100
14 Las Vegas, Nevada 89148
Attorneys for Plaintiff

15 **Akerman LLP**

16 By: /s/ Rex Garner
17 Rex Garner, Esq.
18 1635 Village Center Circle, Suite 200
19 Las Vegas, NV 89134
Attorneys for Defendant

20 IT IS SO ORDERED:

21 

22
23 RICHARD F. BOULWARE, II
24 United States District Court

25 DATED: July 5, 2018.
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 2, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.